

**KELLEY DRYE**  
A LIMITED LIABILITY COMPANY

**APPLICATION GRANTED**

**SO ORDERED**

**VERNON S. BRODERICK**

**U.S.D.J.** 4/15/2024

April 12, 2024

The Honorable Vernon S. Broderick  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *The Nielsen Company (US), LLC v. TVSquared Ltd.*, C.A. No. 1:23-cv-01581-VSB-SN

Dear Judge Broderick:

Plaintiff The Nielsen Company (US), LLC, (“Nielsen”) and Defendant TV Squared Ltd. (“TVSquared”) respectfully submit this joint letter-motion pursuant to Your Honor’s Individual Rules & Practices in Civil Cases to request that the Court stay this case for ninety (90) days and to extend all deadlines in the Scheduling Order as shown below. The parties agree that the stay will apply to all interim deadlines, including the service of and responses and objections to written discovery. This is the parties’ first request to stay the case, and fourth request for an extension of time. *See* Dkt. 135, 159, 171. The court granted the previous three requests. Dkt. 137-138, 160-161, 172-173. In support of this letter-motion, the parties provide the following specific reasons for the stay and extension requests:

The parties held a settlement conference on March 13. The parties have made progress in working towards a settlement, and remain hopeful that further discussions will lead to a mutually agreeable resolution to this lawsuit. The parties seek to continue their negotiations without incurring the substantial costs associated with the impending close of fact discovery and deadlines for expert reports.

A list of existing deadlines and proposed adjusted deadlines is included below. A proposed order reflecting these revised dates is attached hereto as Exhibit A.

ITEM	CURRENT DATE	PROPOSED DATE
Deadline to serve any interrogatories or requests for admission	April 24, 2024	August 30, 2024
Close of fact discovery	May 24, 2024	September 30, 2024
Opening expert reports by party with burden of proof	June 19, 2024	November 15, 2024
Responsive expert reports by party without burden of proof	August 2, 2024	December 20, 2024
Close of expert discovery	September 6, 2024	February 7, 2025
Joint letter to court regarding dispositive motions	September 17, 2024	February 21, 2025
Telephonic post-discovery teleconference	October 1, 2024	March 7, 2025

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Respectfully submitted,

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